

**Commonwealth of Kentucky  
Division for Air Quality**

***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR / SYNTHETIC MINOR (DRAFT PERMIT) No. F-04-018

PRIME FINISH, LLC

PARIS, KY

JULY 26, 2004

MARK LABHART, REVIEWER

PLANT I.D. # 021-017-00031

APPLICATION LOG # 56418

**SOURCE DESCRIPTION:**

Prime Finish dip coats and paints a large diversity of small plastic, aluminum and magnesium parts. The primary sources of emissions for this facility are two robotic spray booths used for painting operations. Each of these booths has manual-operating capabilities. Numerous insignificant activities exist at this source including dip printing operations, pad printing operations, coating ovens, and a paint booth used for research and development proposes.

**COMMENTS:**

Regulation 401 KAR 59:010, New process operations is applicable.

Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances is applicable.

Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations *is not applicable*, since emissions with the Conditional Major limitations will be below major source thresholds.

- The robotic paint booths use water curtain particulate emission controls. Ninety (90) percent efficiency was assumed.
- VOC and HAP emissions were calculated from material balances.
- Emission factors for combustion products from the coating ovens are from AP-42.
- HAP emissions modeled with SCREEN3. All predicted concentrations were below PRGs.
- This is an existing source, previously permitted as F-99-012.
- New to this permit are the pad printing operations. The source added a single-head pad printing system and a six-head pad printing system in March 2000. These two items were reviewed by the Division and approved as insignificant activities on April 6, 2000. With this permit renewal action, the source intends to add an additional single-head pad printing system and a five-head pad printing system. The combined emissions for all pad printing operations are still less than 5 tons per year for VOC and less than 1000 pounds per year for HAP. Therefore, all pad printing operations were listed as insignificant activities in this permit.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

Prime Finish, LLC has requested voluntary permit limits of less than 9.0 tons per year of individual hazardous air pollutants (HAP), less than 22.5 tons per year of combined HAPs, and less than 90 tons per year of VOC.

**PERIODIC MONITORING:**

Prime Finish shall report VOC and HAP emissions semiannually.

**OPERATIONAL FLEXIBILITY:**

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.